

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ROSY GIRON DE REYES; JOSE
DAGOBERTO REYES; FELIX ALEXIS
BOLANOS; RUTH RIVAS; YOVANA
JALDIN SOLIS; ESTEBAN RUBEN MOYA
YRAPURA; ROSA ELENA AMAYA; and
HERBERT DAVID SARAVIA CRUZ,

Plaintiffs,

vs.

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP; WAPLES PROJECT
LIMITED PARTNERSHIP; and A.J.
DWOSKIN & ASSOCIATES, INC.,

Defendants.

Civil Action No. 1:16cv00563-TSE-TCB

**MEMORANDUM IN SUPPORT OF PLAINTIFFS’
MOTION TO FILE DOCUMENTS UNDER SEAL**

Pursuant to Local Civil Rule 5, Plaintiffs Rosy Giron De Reyes, Jose Dagoberto Reyes, Felix Alexis Bolanos, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz (“Plaintiffs”) submit this memorandum in support of its Motion to File Documents under Seal. The documents that Plaintiffs request permission to file under seal are Exhibits 8, 11-14 to Plaintiffs’ Reply Brief in Support of Plaintiffs’ Motion to Compel. The exhibits consist of documents Defendants designated confidential pursuant to the Protective Order (Dkt. 45), including communications between Defendants and third party Yardi, communications among Defendants’ employees, and communications between Defendants and tenants of Waples Mobile Home Park.

Ashcraft v. Conoco, Inc., 218 F.3d 282 (4th Cir. 2000), held that documents may be sealed pursuant to district court order when the court: (1) provides notice to the public and gives it an

opportunity to object to sealing, (2) considers less drastic alternatives, and (3) provides specific findings in support of the decision to seal and the rejection of alternatives. Those requirements are met here.

First, Plaintiffs have concurrently filed a Notice of Motion to be docketed by the Clerk. The Notice will provide the public with an opportunity to object to the sealing of the documents in question.

Second, no feasible alternative exists to sealing these documents, in light of the Protective Order requiring information designated confidential pursuant to the Order to be filed with the court consistent with Local Rule 5 of the Eastern District of Virginia. Accordingly, the utmost discretion and confidentiality is necessary, and filings in this action should be kept under seal.

For these reasons, Plaintiffs respectfully request that the Court grant Plaintiffs' Motion to File Document under Seal. A proposed order is attached.

DATED this 17th day of November, 2016 Respectfully submitted,

/s/ Paul Brinkman

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

Paul Brinkman, VSB # 35950

Jeanhee Hong (*pro hac vice*)

Ariel Wade Trajtenberg (*pro hac vice*)

Diego Durán de la Vega (*pro hac vice*)

Jongwook Kim (*pro hac vice*)

William A. Margeson (*pro hac vice*)

777 Sixth Street NW, 11th Floor
Washington, District of Columbia 20001

Phone: (202) 538-8000

Fax: (202) 538-8100

paulbrinkman@quinnemanuel.com

jeanheehong@quinnemanuel.com

arieltrajtenberg@quinnemanuel.com

diegoduran@quinnemanuel.com

wookiekim@quinnemanuel.com

billmargeson@quinnemanuel.com

LEGAL AID JUSTICE CENTER

Simon Sandoval-Moshenberg, VSB #77110

Rebecca Wolozin, VSB #89690

6066 Leesburg Pike, Suite 520

Falls Church, VA 22041

Phone: (703) 778-3450

Fax: (703) 778-3454

simon@justice4all.org

becky@justice4all.org

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of November, 2016, I filed the foregoing Memorandum electronically with the Clerk of the Court using the ECF system, and caused to be served by electronic mail a copy of the foregoing document upon the following parties:

Michael S. Dingman, VSB #30031
Justin deBettencourt, VSB # 83806
REED SMITH LLP
7900 Tysons One Place, Suite 500
McLean, Virginia 22102
Phone: (703) 641-4200
Fax: (703) 641-4340
mdingman@reedsmith.com
jdbettencourt@reedsmith.com

Counsel for Defendants

/s/ Paul Brinkman

QUINN EMANUEL URQUHART &
SULLIVAN, LLP
Paul Brinkman, VSB # 35950

777 Sixth Street NW, 11th Floor
Washington, District of Columbia 20001-3706
Phone: (202) 538-8000
Fax: (202) 538-8100
paulbrinkman@quinnemanuel.com

Counsel for Plaintiffs